

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

IN RE:)	
)	
MELISSA D. FITZGERALD)	Case No.: 1:16-00165 RNO
)	Chapter 13
Debtor(s))	
)	
BANK OF AMERICA)	
Movant)	
)	
v.)	
)	
MELISSA D. FITZGERALD)	
)	
)	
Respondent(s))	
)	
CHARLES J. DEHART, III)	
Trustee)	

OBJECTION TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:

Debtor, through her attorney, Sean P. Quinlan, Esquire, hereby represents as follows:

1. On or about 1/18/2016, the debtor filed a Chapter 13 Petition with this Court.
2. The debtor's plan as filed scheduled Bank of America, as lien holder on the debtors residential property were to continue to be paid direct and outside the plan by the debtors.
3. On October 23, 2017 the Attorney for Bank of America filed a Motion for Relief from Stay stating that the debtor was deficient on their post-petition mortgage payments. The debtor was contacted and we were informed that they are currently in an active Loan modification trial and she is making those payments as required.

4. For the above stated reason, the debtor through Counsel, requests that Bank of Americas Motion for Relief from Stay be denied as the debtor is currently in a trial loan modification and is current with all payments per that modification.

WHEREFORE, Debtor, through undersigned, requests that this Honorable Court deny Bank of Americas Motion for Relief from Stay.

Dated: 11/5/2017

/s/ Sean P. Quinlan, Esquire
Sean P. Quinlan, Attorney for Debtors